

LAW OFFICE OF MOHAMMED GANGAT

(718) 669-0714 ♦ 675 3rd Ave, Ste 1810, NY, NY 10017 ♦ mgangat@gangatpllc.com

VIA ECF

January 9, 2020

Hon. Paul A. Engelmayer, U.S.D.J
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *De Los Santos v. Marte Construction Inc. et al.*, No. 18-10748 (PAE) (KHP)

Dear Judge Engelmayer:

I represent the plaintiffs in this action, Ignacio Reyes de los Santos, Benito Cantu, Baltazar Reyes Librado, Elvis Martinez, Andy Verdin, and Amador Cantu De Los Santos (collectively, “Plaintiffs”). I write to request an adjournment of the Show Cause Hearing set for February 14, 2020, at 2:30 pm before Your Honor. No previous request to adjourn this hearing has been made. A proposed order is attached hereto.

The Show Cause Hearing concerns plaintiffs’ motion for default judgment against “Defendants” Marte Construction Inc. Joseph M. Marte; Jesus Olaya; Robert Star Plumbing and Heating, Corp.; O.K. Electrical Service Corporation; and Doval Plumbing and Heating Corporation, filed on December 20, 2019 [ECF #77] (the “Motion”). The Show Cause Hearing was scheduled by Your Honor’s order, dated December 23, 2019 and filed on December 23, 2019 [ECF #81] (the “Order”). The Motion and the Order have been served by Plaintiff on Defendants. (See ECF Nos. 82-83.)

The reason I need the adjournment is that I have a vacation involving international travel that has been on my calendar for many months and prior to the Show Cause Hearing being scheduled. I am a solo practitioner, and I am not able to send someone in my place who can adequately represent the Plaintiffs at this very important, significant Show Cause Hearing.

I note that my vacation is from February 3-17, and I am available for the Show Cause Hearing on or after February 18, 2019-March 30, 2019, except for on the following 2 dates/times February 24, 10am-12pm; and March 2, 9am-11pm.

I am not in contact with my adversaries in order to discuss their consent to this request. I am serving a copy of this letter on my adversaries at the time of its filing. No other dates would be affected if this adjournment were granted.

For the reasons set forth above, Plaintiffs respectfully request a brief adjournment of the Show Cause Hearing scheduled for February 14, 2020. As always, I thank the Court for its time and consideration.

Respectfully Submitted,
/s/ Mohammed Gangat
Mohammed Gangat

cc: Joseph M. Marte
1492 Longefellow Avenue
Bronx, NY 10460

Marte Construction Inc.
1492 Longefellow Avenue
Bronx, NY 10460


Jesus Olaya
1492 Longefellow Avenue
Bronx, NY 10460

Doval Plumbing and Heating Corporation
3163 Broadway
New York, NY 10027

Robert Star Plumbing and Heating, Corp.
3163 Broadway
New York, NY 10027

O.K. Electrical Service Corporation
1162 Intervale Avenue
Bronx, NY 10459

The hearing on plaintiff's motion for default judgment is adjourned to April 7, 2020 at 10:30 a.m. Plaintiff is directed to serve this Order on defendants and to file proof of such service by February 1, 2020. SO ORDERED.



PAUL A. ENGELMAIER 1/10/2020
United States District Judge